



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

BDM:KKO
F. #2017R01840

*271 Cadman Plaza East
Brooklyn, New York 11201*

March 2, 2020

By ECF and Courtesy Copy by Interoffice Mail

The Honorable Nicholas G. Garaufis
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Nancy Salzman
Criminal Docket No. 18-204 (S-1) (NGG)

Dear Judge Garaufis:

The government respectfully submits the enclosed Second Amended Consent Preliminary Order of Forfeiture to amend the description of an asset in the Amended Consent Preliminary Order of Forfeiture entered by the Court on July 15, 2019 (the "July 15, 2019 Order") in the above-captioned matter. Counsel for Nancy Salzman consents to the amendment.

The July 15, 2019 Order listed "First Principles Inc., a Delaware corporation, and all assets rights thereof, including but not limited to bank accounts and intellectual property rights." (Docket Entry #760, at page 2, paragraph (ix)). Further review of the Delaware corporation database revealed that the correct name of the company is "First Principles *Incorporated*," and that an unrelated entity was incorporated as "First Principles *Inc.*" To clearly identify the forfeited corporation, the enclosed Second Amended Preliminary Order of Forfeiture corrects the company name and includes two additional identifiers for the company in the asset description: the Federal Employer Identification Number ("FEIN") and Delaware File Number. The government therefore respectfully requests that the Court enter the Second Amended Consent Preliminary Order of Forfeiture.

Thank you for Your Honor's consideration of this submission.

Respectfully submitted,

RICHARD P. DONOGHUE
United States Attorney

By: /s/ Karin Orenstein
Karin Orenstein
Assistant U.S. Attorney
(718) 254-6188

Encl.: Second Consent Amended Preliminary Order of Forfeiture

cc: Counsel of Record (by ECF)